

CV 21-4894

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORKFILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.United States
of America

MATSUMOTO, J.

Plaintiff,

- VS -

★ AUG 23 2021 ★

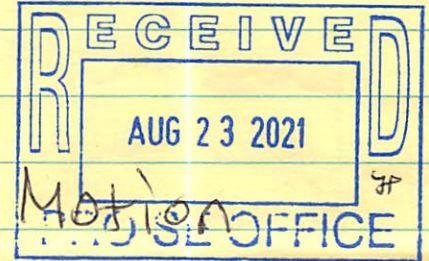
BROOKLYN OFFICE

Docket No.

93-CR-00671

Michael Taylor

Defendant,



PLEASE TAKE NOTICE that upon the annexed affidavit, the defendant will move before the U.S. District Court for the Eastern District of New York, which is located at 225 Cadman Plaza East, Brooklyn NY, 11201, for an order pursuant to Fed. R. Civ. Proc. 60(b)(6) to have access to the courts on the grounds that the defendant is not conferred with such constitutional right.

3. But access to the law library is strictly by appointment only, and access to the law library is limited to only one hour per week;

4. The defendant made efforts to exhaust the defendant's remedies with regards to insufficient access to the law library (exhibit A), but the defendant's efforts proved fruitless;

5. The U.S. District Court for the Eastern District of New York issued an order against the Federal Bureau of Prisons to allow the defendant greater access to the law library within the former pending criminal action (Indictment No. 02-CR-00097);

6. Therefore, the doctrine of judicial estoppel precludes the U.S. District Court from assuming a contrary position with respect to the issuance of court orders to allow greater access to the law library.

VERIFICATION

Pursuant to Title 28 U.S.C. Section 1746, I hereby certify that the foregoing Statement are true and correct. Executed on August 6th, 2021.

Michael Teylor

UNITED STATES DISTRICT COURT
EASTERN DISTRICT of NEW YORK

United States
of America

Plaintiff,

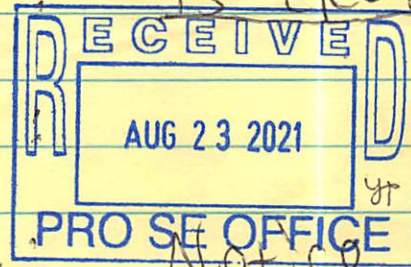
-vs-

Docket No.

93-CR-00671

Michael Taylor

Defendant,



Notice
of Appeal

Notice is hereby given that
Michael Taylor, the defendant in the
above-titled action, hereby appeals to
the U.S. Court of Appeals for the
Second Circuit from a determination
that has not yet been finalized.

Michael Taylor
Michael Taylor #611670
South Woods State Prison
215 Burlington Road South
Bridgeton NJ 08302

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

United States
of America

Plaintiff, :

-vs-

Docket No.

93-CR-00621

Michael Taylor

Defendant, :

Certificate
of Service

I hereby certify that I
have served a copy of a notice of motion
upon the U.S. Attorney's office by
ordinary mail to the address listed as
follows: 271 Cadman Plaza East,
Brooklyn NY, 11201.

VERIFICATION

Pursuant to Title 28 U.S.C.

Section 1746, I hereby certify that the
foregoing statements are true and correct.
Executed on August 6th, 2021.

Michael Taylor

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

United States
of America

Plaintiff, :

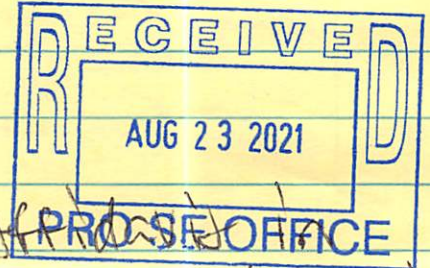
- vs -

Docket No.

93-CR-00671

Michael Taylor

Defendant, :



Support of motion

I, Michael Taylor, being of full age,
hereby says:

1. Within the near future, the
defendant intends to renew the motion
to file a late notice of appeal based
upon new facts not raised within the
prior motion;

2. In order to renew such
motion, the defendant must conduct
effective legal research within the
law library;

to: U.S. Attorney's office
271 Cadman Plaza East
Brooklyn NY 11201

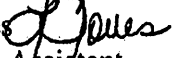
August 6th, 2021
Date

Michael Taylor
Defendant pro se

SOUTH WOODS STATE PRISON
BRIDGETON, NJ 08302

TO: Michael Taylor 611670 / 479281C
32-L

DT: December 4, 2015

FR: Luz Torres 
Executive Assistant
South Woods State Prison

RE: Letter to the Governor's Offices – 10/29/2015

On December 4, 2015 at your interview with this writer, you identify five (5) issues:

1. **Do not want to get pre-approval for typewriter ribbons.**
Per Internal Management Procedure #18.025, effective March 1999; prior to ordering any materials (including but not limited to, Word Processors/typewriters, college correspondences, etc.) inmates must complete a Package Request Form. The item can be ordered only after receiving approval by the Package Committee. Any package that is received by the Mailroom and does not have an approval will be rejected.
2. **Refund of all payments of court-imposed fines.**
Per 2C:46-4. Fines, assessments and restitution; collection; disposition. All fines, or restitution imposed by the Superior Court in conjunction with a custodial sentence to a State correctional facility shall be collected by the Department of Corrections. As per our conversation you are aware of this regulation, and in addition, you have been paying fines since 12/2008. You have paid a total of \$1,485.01 and your balance due is \$199.99.
3. **Send out legal mail, certified receipt requested, without paying the certified mail fees.**
In your letter you stated that you are indigent, however our records do not confirm that you are indigent. Your legal mail has been addressed by 10A; 18-3.7 Cost of mailing legal correspondence for nonindigent inmate. If you have the funds in your account, you are charged for the total cost of mailing legal correspondence. If you do not have the money in your account, your mail will be sent out, and your account will be charged. Not having money in your account will not prevent you from sending legal mail.
4. **Attend the law library for five-days per week.**
Currently, you are scheduled to attend the law library Mondays and Tuesdays for the month of December. Per IMP #06.001 Legal Access Plan. The use of Law Library services are "Based on the availability of space, supervisory staff and the security needs of the correctional facility". Per our conversation, you have not presented any valid reason, such as court dates and deadlines, to have extra time in the Law Library.

Michael Taylor # 60670
South Woods State Prison
215 Burlington Road South
Bridgeton NJ 08302

U.S. District Court

225 Cadman Plaza East
Brooklyn NY 11201
Attn: Clerk of the Court

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